

Michael Faillace & Associates, P.C.

60 East 42nd Street

Suite 4510

New York, NY 10165

Ph:(212) 317-1200

Fax:(212) 317-1620

Vicente Carrasco Flores

September 25, 2018

Attention:

File #: PastaandRiso

Inv #: Sample

RE: Carrasco Flores et al v. NYC Pasta and Risotto co. LLC et al

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Sep-04-17	drafted complaint; discussed facts of case with client; sent complaint to staff for finalization	2.30	1,035.00	MF
Sep-10-17	contacted client to determine whether other client is going to join the case	0.10	45.00	MF
Sep-11-17	interviewed new client and got the facts for the complaint	0.70	315.00	MF
Sep-12-17	reviewed and corrected complaint; requested that staff review and file the complaint	1.50	675.00	MF
Sep-18-17	reviewed language of complaint and filed it for future use	0.30	135.00	MF
Nov-10-17	Emails with Opposing counsel about case	0.10	37.50	CM
Nov-28-17	Letter re motion to dismiss and emails with OC	0.20	75.00	CM
Dec-01-17	Discussion with client about Ajit and emails with OC	0.20	75.00	CM
Dec-07-17	Review of Amended Complaint	0.30	112.50	CM
Dec-08-17	discussed the issue of individual ownership in FLSA with CM	0.10	45.00	MF

Dec-19-17	CM informed us that oc informed him of bankruptcy filing	0.10	45.00	MF
Jan-15-18	2nd CMP and discussion with OC	0.20	75.00	CM
Jan-17-18	Initial Conference	1.00	375.00	CM
Mar-19-18	Discussions with Opposing counsel about potential bankruptcy filing letter motion for extension of time	0.30	112.50	CM
Apr-16-18	·DEPOSITION of of Sati, with pre depo preparation, def was late	2.50	937.50	CM
Apr-18-18	discussed with CM the responses given by the owner of the business during the deposition	0.10	45.00	MF
May-04-18	Second Letter	0.20	75.00	CM
May-14-18	discussed with CM what occurred at the depositions	0.10	45.00	MF
	discussed with CM whether or not we should file a motion to compel to determine the name of the manager who our client dealt with in the business	0.10	45.00	MF
May-15-18	discussed with CM the motion to amend the complaint he will file in order to get another defendant into the case	0.10	45.00	MF
	·DEPOSITION of of Montoya, pre-depo preparation	1.75	656.25	CM
May-17-18	discussed with CM oc's threat to file a rule 11 motion and what we need to do about it	0.10	45.00	MF
	Emails with Opposing counsel about potential other Defendants	0.30	112.50	CM
Jun-13-18	Letter to Court and emails with OC	0.20	75.00	CM
Jun-25-18	First Drafts of JPTO, Voir Dire, and pre trial submissions, review of file	2.50	937.50	CM
Jul-09-18	review and filing of pre-trial submissions	0.30	112.50	CM
Aug-14-18	discussed status of case with staff	0.10	45.00	MF

Aug-17-18	status letter	0.10	37.50	CM
Aug-21-18	discussed with CM what occurred in the court and what the judge ordered; discussed with CM the strategy he will take in the deposition to establish that defendants were employers	0.30	135.00	MF
	status conference	1.00	375.00	CM
Aug-28-18	discussed with CM the approach he is taking in preparing the clients and what we will have to do if we go to trial	0.10	45.00	MF
	trial preparation with each plaintiff	4.00	1,500.00	CM
	Helped prepare client for trial (translated).	1.00	100.00	PL
Aug-29-18	Trial memo and trial pre: review of file, assembly of exhibits, case law, dockets, reseach	2.75	1,031.25	CM
Aug-31-18	trial preparation with mukhina and review of judgement	2.50	937.50	CM
Sep-03-18	File pre trial memo	0.10	37.50	CM
Sep-04-18	discussed with CM the plan of action he has for the trial	0.20	90.00	MF
	reviewed status of the case with CM and provided him advice on further course of action	0.10	45.00	MF
Sep-05-18	discussed with CM approach he plans to take at trial to prove individual liability and arguments that oc is raising	0.10	45.00	MF
	discussed what occurred at the trial with CM	0.70	315.00	MF
	Trial - preparation, discussions with clients, review of verdict sheet, memo, hearing, jury selection, first witnesses, post trial research and review, discussions with clients	10.00	3,750.00	CM
Sep-06-18	discussed with CM the legal issues he presented to the judge in the legal memo	0.20	90.00	MF
	Interim Memo, review of Opposing counsel memo, discussions with counsel at office, trial stipulation circulated, call with court,	6.00	2,250.00	CM

	discussions with Opposing counsel, review of transcript, research into case law, emails at the end of the night with chambers and OC			
	legal research effect of tips on mw	0.70	245.00	GN
Sep-07-18	Last day of trial - pre-trial preparation , pre trial emails and review of interim filings, review of charges, verdict sheet, finals witnesses, summation preparation, discussions with clients, waiting for verdict, post trial discussion with clients	8.00	3,000.00	CM
Sep-25-18	Final damage chart for submission	0.50	187.50	CM
	Totals	54.10	<u>\$20,550.00</u>	

DISBURSEMENTS

	Filing Fee	400.00	
Sep-26-17	Process Server NYC Pasta & Risotto Co. LLC	63.00	
Sep-28-17	Process Server DGR - Daniel Montoya	84.70	
	Process Server DGR - Satinder Sharma	30.20	
	Process Server DGR - NYC Pasta and Risotto Co	30.20	
Apr-16-18	·DEPOSITION of Satinder Sharma	453.50	
May-15-18	·DEPOSITION of Daniel Montoya	318.50	
Sep-05-18	Transcript of Trial September 5, 2018 (Invoice 0503788-IN)	334.05	
Sep-06-18	interpreter Marcia Gottler (3 days x 800)	2,400.00	
	interpreter Jan Calloway (3 days x 800)	2,400.00	
Sep-07-18	Transcript of Trial September 7, 2018 (Invoice 0503786-IN)	455.88	
	Totals	<u>\$6,970.03</u>	
	Total Fee & Disbursements		<u>\$27,520.03</u>
	Balance Now Due		<u>\$27,520.03</u>